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6 Attorneys for Plaintiff SYNOPSYS, INC.  
and for Defendants AEROFLEX INCORPORATED,  
7 AMI SEMICONDUCTOR, INC., MATROX  
ELECTRONIC SYSTEMS, LTD., MATROX  
8 GRAPHICS, INC., MATROX INTERNATIONAL  
CORP., MATROX TECH, INC., and  
9 AEROFLEX COLORADO SPRINGS, INC.

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 RICOH COMPANY, LTD.,

14 Plaintiff,

15 vs.

16 AEROFLEX INCORPORATED, AMI  
SEMICONDUCTOR, INC., MATROX  
17 ELECTRONIC SYSTEMS LTD., MATROX  
GRAPHICS INC., MATROX INTERNATIONAL  
18 CORP., MATROX TECH, INC., AND  
AEROFLEX COLORADO SPRINGS, INC.

19 Defendants.

20 SYNOPSYS, INC.,

21 Plaintiff,

22 vs.

23 RICOH COMPANY, LTD.,

24 Defendant.

Case No. C03-04669 MJJ (EMC)

Case No. C03-02289 MJJ (EMC)

**DECLARATION OF MICHAEL J. WAGNER  
IN SUPPORT OF DEFENDANTS' MOTION  
FOR SUMMARY JUDGMENT REGARDING  
THE SCOPE OF PATENT DAMAGES**

**FILED UNDER SEAL**

Date: September 26, 2006

Time: 9:30 a.m.

Courtroom: 11, 19th Floor

Judge: Martin J. Jenkins

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26 **CONFIDENTIAL FILED UNDER SEAL**  
27 **PURSUANT TO PROTECTIVE ORDER**  
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1 I, MICHAEL J. WAGNER, declare as follows:

2 1. I am a Senior Advisor with CRA International. I have been retained on behalf of Aeroflex  
3 Incorporated, Aeroflex Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronics Systems,  
4 Ltd., Matrox Graphics, Inc., Matrox International Corp., and Matrox Tech, Inc. to address damages issues  
5 related to the alleged infringement of U.S. Patent No. 4,922,432 ("the '432 patent") entitled "Knowledge  
6 Based Method and Apparatus for Designing Integrated Circuits Using Functional Specifications." I make  
7 this declaration of my personal knowledge, and if called as a witness, I could and would testify competently  
8 to the statements contained herein.

9 2. On July 24, 2006, I submitted a report containing my conclusions on damage issues related  
10 to the alleged infringement of the '432 patent. The report I submitted set forth my conclusions regarding  
11 the appropriate royalty base and royalty rate should damages be awarded for infringement of the '432  
12 patent.

13 3. Exhibit 1 is a true and correct copy of excerpts of my report.

14 4. There are in sales of Matrox boards both designed and sold outside of the  
15 United States. Schedule 1 to this declaration explains these calculations.

16  
17 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
18 is true and correct. This declaration was executed at Palo Alto, CA on August 18, 2006  
19 2006

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21  
22 By: Michael J. Wagner  
23 Michael J. Wagner  
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EXHIBIT 1  
To Wagner  
Declaration  
Filed Under  
Seal Pursuant to  
Protective Order